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March 11, 2013

Ms. Mindy Fogg

County of San Diego

5510 Overland Avenue, Suite 310

San Diego, CA 92123

Subject: Forest Conservation Initiative Lands General Plan Amendment – Draft Supplemental Environmental Impact Report

Dear Ms. Fogg:

San Diego Gas and Electric (SDG&E) has reviewed the Draft Supplemental EIR (SEIR) for the Forest Conservation Initiative Lands (FCI) GPA and would like to submit the following comments on the document. The proposed project involves changes to land use designations on property where either SDG&E has a right-of-way and/or easement for existing electrical facilities or property that SDG&E owns. SDG&E is a utility regulated by the California Public Utilities Commission (CPUC) that provides electric and gas services to customers throughout San Diego County. The CPUC mandates that SDG&E maintain its utility infrastructure and easements, and several facilities are located within lands identified in the SEIR as Former FCI Lands and Areas Changed outside FCI including the following: 1) Four substations; 2) Over 3,700 distribution poles; 3) Over 400 transmission poles; and 4) associated access roads.

1. SDG&E would like clarification added to the SEIR and the General Plan that the proposed land use designations for the former FCI lands would not involve restrictions that would adversely affect SDG&E's access and ability to conduct routine operation, maintenance and repair activities on its infrastructure within the project area, or to construct new facilities. Table 1-1B of the SEIR Project Description shows that Village Residential, Semi-rural Residential, Rural Lands and Rural Commercial would be applied to a majority of the Former FCI lands. The Semi-rural and Rural Lands designations would cover a majority of the GPA land use designations. Based on a review of the proposed land use designations included in the General Plan it does not appear that any of language in the land use designations relates to existing or proposed electrical utilities or facilities.
2. The SEIR in Section 2.14 discusses the potential for growth generated by the new land use designations that could create the need for new electrical facilities. In addition, Table 1-3 of the DEIR describes future regional energy and utility projects. However, the SEIR should include a

discussion stating that the proposed land use designations in the General Plan as well as the Community Plan and Subregional Plan Updates described in Section 1.5.2.3 of the DEIR would not affect the ability of SDG&E to maintain or improve existing facilities, or to construct new facilities.

3. SDG&E would like clarification added to the SEIR and the General Plan that future zoning changes and rezones necessary to implement the GPA would not involve restrictions that would affect the ability of SDG&E to maintain or improve existing facilities. Section 1.5.2.5 of the DEIR states that the proposed project also involves amendments to the Zoning Ordinance. Similar to comment 1, SDG&E requests that clarification be added to the SEIR and General Plan that the proposed amendments to the zoning ordinance would not affect the ability of SDG&E to maintain or improve existing facilities, or to construct new facilities.

Thank you for the opportunity to review and comment on the SEIR. If you have any questions or need any additional information regarding these comments please contact me at (858) 637-3702 or at blessent@semprautilities.com.

Sincerely,

A handwritten signature in cursive script that reads "Beverly Blessent". The signature is written in dark ink and is positioned above the printed name.

Beverly E. Blessent, AICP

Principal Environmental Specialist, SDG&E

Environmental Programs